

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

HOPE BOLDEN,

Plaintiff,

V.

Case Number: 2:08cv21

**MICKI BETH STILLER, P.C. and
MICKI BETH STILLER,**

Defendants.

REPORT OF RULE 26(f) PARTIES' PLANNING MEETING

Pursuant to Fed.R.Civ.P 26(f), a meeting was held between counsel for the parties on the 7th day of March, 2008, via telephone, and now the parties submit the following report of the meeting to the Court for its consideration.

1. The meeting was attended by:

- a. Constance C. Walker, attorney for the Plaintiff Hope Bolden;
- b. M. Wayne Sabel, attorney for the Defendants Micki Beth Stiller, P.C. and

Mickie Beth Stiller.

2. Pre-discovery disclosures: The parties will exchange by March 20, 2008 the information required by Local Rule 26.1(a)(1).

3. Discovery Plan: The parties jointly propose to the Court the following discovery plan:

- a. Discovery will be needed on the following subjects: All matters raised in the Plaintiff's Complaint and Defendants' Answer and Counterclaim;

- b. All discovery commenced in time to be completed by January 16, 2009;

c. Maximum of 40 interrogatories by each party to any party; responses due 30 days after service;

d. Maximum of 40 requests for production by each party to any party. Responses due 30 days after service;

e. Maximum of 30 requests for admission by each party to any party. Responses due 30 days after service;

f. Maximum of 10 depositions by Plaintiff and 10 depositions by Defendants unless otherwise agreed to by the parties;

g. Each deposition, other than that of the parties, limited to a maximum of 7 hours, unless otherwise agreed to by the parties; parties' depositions limited to a maximum of 8 hours unless otherwise agreed to by the parties;

h. Reports from retained experts under Rule 16(a)(2) due:

i. from Plaintiff by September 16, 2008;

ii from Defendants by October 16, 2008;

i. Supplementation under Rule 16(e) due November 17, 2008.

4. Other matters:

a. The parties do not request a conference with the Court before entry of the Scheduling Order;

b. Plaintiff should be allowed until July 16, 2008 to join additional parties and until July 16, 2008 to amend the pleadings;

c. Defendants should be allowed until August 18, 2008 to join additional parties and until August 18, 2008 to amend the pleadings;

d. All potentially dispositive motions should be filed by November 17, 2008;

- e. Settlement cannot be realistically evaluated prior to February 16, 2009;
- f. The parties request a final pretrial conference on February 16, 2009;
- g. Final lists of witnesses and exhibits under Rule 26(a)(3) due:
 - i. from Plaintiff: 30 days before trial; and
 - ii from Defendants: 30 days before trial.
- h. The parties should have until no less than 14 days prior to trial to file objections to witnesses and exhibits under Rule 26(a)(3);
- i. The case should be ready for trial by March 16, 2009, and is to take approximately two days. The parties are interested in ADR at this time.

Respectfully submitted this the 7th day of March, 2008.

/s/Constance C. Walker
Constance C. Walker (ASB-5510-L66C)
Attorney for Plaintiff Hope Bolden

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CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of March, 2008, I electronically filed the foregoing with the Clerk of the Court using the **CM/ECF** system that will send notification of such filing to the following counsel:

M. Wayne Sabel
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/s/Constance C. Walker
OF COUNSEL

